

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

MICHAEL C. VAN, ESQ.
Nevada Bar No. 3876
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
SHUMWAY VAN
8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770
Facsimile: (702) 478-7779
Email: michael@shumwayvan.com
garrett@shumwayvan.com

Attorneys and Local Counsel for Plaintiffs

FARHAD NOVIAN (California Bar No. 118129; admitted pro hac vice)
farhad@novianlaw.com
ANDREW B. GOODMAN (California Bar No. 267972; admitted pro hac vice)
agoodman@novianlaw.com
ALEXANDER B. GURA (California Bar No. 305096; admitted pro hac vice)
gura@novianlaw.com
NOVIAN & NOVIAN, LLP
1801 Century Park East, Suite 1201
Los Angeles, CA 90067
Telephone: (310) 553-1222
Facsimile: (310) 553-0222

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual;

CASE NO.: 2:20-cv-2045-RFB-BNW

STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLY BRIEFS TO MOTIONS TO COMPEL (ECF NOS. 66, 67, 68, 69, 70, 71, 72, 73)

(First Request)

SHUMWAY • VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Telephone: (702) 478-7770 Facsimile: (702) 478-7779

DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO GALUPPO, an individual; DENIS KOPITAS, an individual; TERRY TSATAS, an individual; GEORGE TSATAS, an individual; PANAGIOTA TSATAS, an individual; OURANIA TSATAS, an individual; KIRIAKOS PRIMBAS, an individual; EVANTHIA PRIMBAS, an individual; PATRICK AYOUB, an individual; MICHAEL BESCEC, an individual; ERNEST LEBOEUF, an individual; PHILIPPE LEGAULT, an individual; EFTIHIOS LITSAKIS, an individual; GIOVANNI MONCADA, an individual; MARC RIEL, an individual; JARADEH SALIM, an individual; HANI HAMAM, an individual; CONSTANTIN ZISSIS, an individual; BESSIE PEPPAS, an individual; NIKI PALIOVRAKAS, an individual,

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK, INC., a Nevada Corporation; MICHAEL J. WARREN, an individual; J. EDWARD DANIELS, an individual; MARIUS DE MOS, an individual; JASON DE MOS, an individual; ROBERT BRUCE HARRIS, an individual; KELLY KABILAFKAS, an individual; and APCENTIVE, INC., a Nevada Corporation,

Defendants.

SHUMWAY•VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLIES

Plaintiffs (as listed in the above caption) and Defendants (as listed in the above caption) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulation to Extend Time to File Oppositions and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

WHEREAS, on August 27, 2021, Plaintiffs filed eight (8) Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73), and on August 31, 2021, the Court set hearing dates on the Motions to Compel as follows (ECF No. 75):

- October 26, 2021 at 10:00 a.m. (ECF Nos. 66, 67, 68).
- October 28, 2021 at 10:00 a.m. (ECF Nos. 69, 70, 71).
- November 3, 2021 at 10:00 a.m. (ECF Nos. 72, 73).

WHEREAS, Defendants’ Oppositions to the Motions to Compel are currently due on September 10, 2021 and Plaintiffs’ Replies are currently due on September 17, 2021;

WHEREAS, at the September 3, 2021 hearing on Defendants’ Motion to Dismiss (ECF No. 39), Rule 11 Motion (ECF No. 50), and Motion to Stay (ECF No. 53), the Court ordered the Parties to further meet and confer regarding the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) in light of its rulings that day (ECF No. 76);

WHEREAS, the Parties agree that they need additional time to meaningfully have further meet and confer discussions;

WHEREAS, this is the Parties’ first request for an extension of the deadlines to file Oppositions and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73);

WHEREAS, the Parties can extend the deadlines to file Oppositions and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) by three weeks without moving the hearing dates at this time;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their respective attorneys of record, that, for good cause, the deadlines to file Opposition and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) are extended by three weeks as follows:

SHUMWAY • VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Telephone: (702) 478-7770 Facsimile: (702) 478-7779

Current deadline to file Oppositions to Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	September 10, 2021
New deadline to file Oppositions to Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 1, 2021
Current deadline to file Replies re Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	September 17, 2021
New deadline to file Replies re Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 8, 2021

IT IS SO STIPULATED.

DATED: September 8, 2021

Respectfully submitted.

SHUMWAY VAN
NOVIAN & NOVIAN, LLP

By: /s/ Andrew B. Goodman

MICHAEL C. VAN, ESQ. #3876
GARRETT R. CHASE, ESQ. #14498
8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123

FARHAD NOVIAN, ESQ. (California Bar No. 118129)

ANDREW B. GOODMAN, ESQ. (California Bar No. 267972)

ALEXANDER BRENDON GURA, ESQ.
(California Bar No. 305096)

1801 Century Park East, Suite 1201

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

Los Angeles, CA 90067
Attorneys for Plaintiffs

DATED: September 8, 2021

Respectfully submitted.

GREENSPOON MARDER LLP
THE MALONEY FIRM, APC

By: /s/ Gregory M. Smith (electronically signed with
permission to Andrew B. Goodman)

PHILLIP SILVESTRI, ESQ. #11276
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169

PATRICK M. MALONEY, ESQ. (California Bar
No. 197844)
GREGORY M. SMITH, ESQ. (California Bar No.
259971)
Attorneys for Defendants

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: September 9, 2021

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

CERTIFICATE OF SERVICE

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of the above document on September 8, 2021, via the Court's CM/ECF system. Any other parties or counsel of record will be served by regular and/or electronic mail.

/s/ Andrew B. Goodman
Andrew B. Goodman